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Tonopah Solar Energy, LLC

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

BRAHMA GROUP, INC., a Nevada corporation,

Plaintiff,

vs.

TONOPAH SOLAR ENERGY, LLC, a Delaware
limited liability company; DOES I through X; and
ROE CORPORATIONS I through X,

Defendant.

TONOPAH SOLAR ENERGY, LLC, a Delaware
limited liability company; DOES I through X; and
ROE CORPORATIONS I through X,

Counterclaimant,

vs.

BRAHMA GROUP, INC., a Nevada corporation,

Counterdefendant.

Case No. 2:18-cv-01747-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO RESPOND TO
BRAHMA GROUP, INC.'S MOTION TO
LIFT STAY, SUBSTITUTE THE
REORGANIZED TSE LLC, JOIN COBRA
AND AHAC, AND REMAND TO STATE
COURT (ECF NO. 87)**

(FIRST REQUEST)



Defendant/Counterclaimant Tonopah Solar Energy, LLC (“TSE”) and Plaintiff/Counterdefendant Brahma Group, Inc. (“Brahma”), by and through their respective undersigned counsel, hereby stipulate and agree to extend the deadline for TSE or any interested non-parties, including, but not necessarily limited to rTSE, Cobra Thermosolar Plants, Inc., and American Home Assurance Company, to the extent necessary, to respond to Brahma’s Motion to Lift Stay, Substitute the Reorganized TSE LLC, Join Cobra and AHAC, and Remand to State Court (“Motion”) (ECF No. 87) from September 24, 2021 to October 11, 2021. Brahma filed the Motion on September 10, 2021. This is the first stipulation for an extension of time to respond to the Motion.

The parties submit that good cause exists for the extension given the number and complexity of the issues raised in the Motion and the parties’ prior agreement that they would afford each other 30 days notice if they sought to lift the stay currently in place (*see* ECF No. 84). The parties further submit that the extension is in good faith and not for the purposes of delay.

DATED: September 20, 2021

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/s/ Ryan T. Gormley

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Brahma Group, Inc

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: September 20, 2021